

1
2
3
4
5 UNITED STATES DISTRICT COURT
6 DISTRICT OF NEVADA

7 MARK GUZY,

8 Plaintiff,

9 vs.
10

11 MARY ANN GUZY,

12 Defendant.
13

Case No. 3:19-cv-00129-LRH-CBC

**VERIFIED PETITION FOR
PERMISSION TO PRACTICE
IN THIS CASE ONLY BY
ATTORNEY NOT ADMITTED
TO THE BAR OF THIS COURT
AND DESIGNATION OF
LOCAL COUNSEL**

14 Keith A. Dotseth, Petitioner, respectfully represents to the Court:

15 1. That Petitioner is an attorney at law and a member of the law firm of
16 Larson • King, LLP, with offices at 30 East Seventh Street, Suite 2800, Saint Paul,
17 Minnesota, 55101, (651) 312-6575, kdotseth@larsonking.com.
18

19 2. That Petitioner has been retained personally or as a member of the law firm
20 by Mary Ann Guzy to provide legal representation in connection with the above-entitled
21 case now pending before this Court.
22

23 3. That since October, 1990, Petitioner has been and presently is a member in
24 good standing of the bar of the highest Court of the State of Minnesota where Petitioner
25 regularly practices law. Petitioner shall attach a certificate from the state bar or from the
26 clerk of the supreme court or highest admitting court of each state, territory, or insular
27
28

possession of the United States in which the applicant has been admitted to practice law certifying the applicant's membership therein is in good standing.

4. That Petitioner was admitted to practice before the following United States District Courts, United States Courts of Appeal, and Courts of other States on the dates indicated for each, and that Petitioner is presently a member in good standing of the bars of said Courts.

<u>Jurisdiction</u>	<u>License Number</u>	<u>Admitted</u>
USDC for the District of Minnesota	210304	October, 1990
USDC for the Western District of Wisconsin	No bar number	August, 2004
USDC for the District of Columbia	W10017	December, 2010
USDC for the Northern District of New York	517832	October, 2012
USDC for the Southern District of Ohio	PHV002	2011
USDC for the Western District of Michigan	No bar number	June, 2015
U.S. Court of Appeals for the First Circuit	1162045	January, 2014
U.S. Court of Appeals for the Third Circuit	No bar number	May, 2002
U.S. Court of Appeals for the Eighth Circuit	04-0429	August, 2004

5. That there are or have been no disciplinary proceedings instituted against Petitioner, nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory or administrative body, or any resignation or termination in order to avoid disciplinary or disbarment proceedings, except as described in detail below:

None.

6. That Petitioner has never been denied admission to the State Bar of Nevada.

None.

7. That Petitioner is a member in good standing in the following Bar Associations.

1
2 Ramsey County Bar Association

3 Minnesota State Bar Association

4 American Bar Association
5

6
7 8. Petitioner has filed application(s) to appear as counsel under Local Rule IA
8 11-2 (formerly LR IA 10-2) during the past three (3) years in the following matters:
9 None.

10
11 9. Petitioner consents to the jurisdiction of the courts and disciplinary boards
12 of the State of Nevada with respect to the law of this state governing the conduct of
13 attorneys to the same extent as a member of the State Bar of Nevada.

14
15 10. Petitioner agrees to comply with the standards of professional conduct
16 required of the members of the bar of this court.

17
18 11. Petitioner has disclosed in writing to the client that the applicant is not
19 admitted to practice in this jurisdiction and that the client has consented to such
20 representation.

21 The Petitioner respectfully prays that Petitioner be admitted to practice before this
22 Court FOR THE PURPOSES OF THIS CASE ONLY.

23 /s/ Keith A. Dotseth

24 Keith A. Dotseth
25
26
27
28

1 STATE OF MINNESOTA)
2) ss.
3 COUNTY OF RAMSEY)

4 Keith A. Dotseth, Petitioner, being first duly sworn, deposes and says: That the
5 foregoing statements are true.

6 /s/ Keith A. Dotseth
7 Keith A. Dotseth

8 *SUBSCRIBED* and *SWORN* to before
9 me this 13th day of March, 2019.

10 /s/ Kimberly A. Lewis
11 Notary Public, Ramsey County, MN
12 My commission expires: 1/31/2020

13 **DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO**
14 **THE BAR OF THIS COURT AND CONSENT THERETO.**

15 Pursuant to the requirements of the Local Rules of Practice for this Court, the
16 Petitioner believes it to be in the best interests of the client to designate Danielle L.
17 Christenson, attorney at law, a member of the State of Nevada and previously admitted to
18 practice before the above-entitled Court as associate resident counsel in this action. The
19 address and email address of said designated Nevada counsel is:
20

21
22 Heritage Law Group, P.C.
23 1625 Highway 88, Ste. 304
24 Minden, NV 89423
25 (775) 782-0040
danielle@heritagenevada.com

26 By this designation, the Petitioner and undersigned party agree that this designation
27 constitutes agreement and authorization for the designated resident admitted counsel to
28 sign stipulations binding on all of us.

The undersigned party appoints Danielle L. Christenson as her Designated Resident Nevada Counsel in this case.

Mary Ann Guzy

The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

Danielle@heritagenevada.com

Dated: this 14th day of March, 2019.

Verified Petition Re: Pro Hac Vice Admission - 5

STATE OF MINNESOTA IN SUPREME COURT

Certificate of Good Standing

This is to certify that the following lawyer is in good standing.

KEITH A. DOTSETH

was duly admitted to practice as a lawyer and counselor at law in all the courts of this state on

October 26, 1990

Given under my hand and seal of this court on

March 13, 2019

Emily J. Eschweiler

Emily J. Eschweiler, Director
Office of Lawyer Registration

